



Tom Orlando
Lorain County Clerk of Courts

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FAX/EMAIL COVER SHEET

DATE: AUGUST 17, 2020

FAX #: 513-361-0335

EMAIL:

TO: ROETZEL & ANDRESS

ATTN: CHARLOTTE

FROM: BOBBI

DESCRIPTION: CASE NO. 20CV201615 - COMPLAINT

NUMBER OF PAGES (INCLUDING COVER): 4

**IF THERE ARE ANY PROBLEMS RECEIVING THIS
TRANSMISSION, PLEASE CALL AS SOON AS POSSIBLE
AT THE NUMBER LISTED ABOVE.**

FILED
LORAIN COUNTY
IN THE COURT OF COMMON PLEAS
2020 AUG 10 LORAIN COUNTY, OHIO

COURT OF COMMON PLEAS
DIANA WHITE TON ORLANDO
5287 Pleasant St.
N. Ridgeville, OH 44039
Plaintiff

vs.

LELAND COURTNEY
44 Goss Lane
Fair Grove, MO 65648

and

FBNT, L.L.C.
44 Goss Lane
Fair Grove, MO 65648
Defendants

20 CV 201615

JUDGE MARK A. BETLESKI

COMPLAINT

(Jury Demand Endorsed
Hereon)

FILED

COUNT I

1. On or about August 13, 20108, in Lorain County, Ohio, Defendant Leland Courtney (hereinafter "Courtney") negligently operated a motor vehicle so as to cause a collision with a vehicle driven by the Plaintiff.

2. As a proximate result of the Defendants' actions, the Plaintiff suffered injuries to her back, neck, shhoulder, head and other body parts, some of which are continuling and permanent in nature.
3. As a proximate result of the Defendants' actions, the Plaintiff incurred medical expensed in the approxlmate amount of \$40,000.00 and expects to incur further such expenses.
4. As a proximate result of the Defendants' actions, the Plaintiff has experienced and will continue to experience physical pain and suffering, mental angulsh and a dlminished quality of life.

COUNT II

5. Plaintiff realleges each and every allegation set forth in Paragraphs 1-4 hereof as if fully rewritted herein.
6. At all times pertinent hereto, FBNT, L.L.C. (hereinafter "FBNT") was the employer of Defendant Courtney and the owner of the vehicle driven by Courtney.
7. At all times pertinent hereto Defendant Courtney was acting in the scope of his employment with FBNT and in the furtherance of its interests.

8. As a result of the relationship between Defendants FBNT and Courtney, FBNT is vicariously liable for the actions of Courtney as set forth herein.

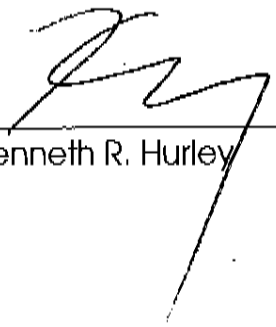
WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, in an amount sufficient to compensate her for the damages she has sustained, in an amount in excess of \$25,000.00, plus costs, and any other relief deemed just and equitable by this Court.



Kenneth R. Hurley (0029509)
Attorney for Plaintiff
12351 Prospect Road
Strongsville, OH 44149
330/998-1757
royaltonlaw@aol.com

JURY DEMAND

Plaintiff demands that this case be tried before a jury.



Kenneth R. Hurley



LORAIN COUNTY COURT OF COMMON PLEAS

LORAIN COUNTY JUSTICE CENTER

225 COURT STREET

ELYRIA, OHIO 44035

DIANA WHITE
5287 PLEASANT ST
NORTH RIDGEVILLE, OH 44039

CASE NO. 20CV201615

VS.

TO: LELAND COURTNEY
44 GOSS LANE
FAIR GROVE, MO 65648

SUMMONS ON COMPLAINT

You have been named defendant in a complaint filed in Lorain County Court of Common Pleas by plaintiff(s):

DIANA WHITE
5287 PLEASANT ST
NORTH RIDGEVILLE, OH 44039

A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is:

KENNETH R HURLEY
12351 PROSPECT ROAD
STRONGSVILLE, OH 44149

You are hereby summoned and required to serve a copy of your answer to the complaint upon the plaintiff's attorney, or upon the plaintiff, if he has no attorney of record, within **TWENTY-EIGHT (28) DAYS** after service of this summons on you, exclusive of the day you receive it. Your answer must **ALSO** be filed with this Court within three (3) days after you serve, (delivered or by mail), a copy of your answer on the plaintiff's attorney.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

TOM ORLANDO
CLERK OF COURTS OF COMMON PLEAS
LORAIN COUNTY, OHIO

BY: _____

[Signature]
Deputy Clerk

20CV201615



LORAIN COUNTY COURT OF COMMON PLEAS

LORAIN COUNTY JUSTICE CENTER

225 COURT STREET

ELYRIA, OHIO 44035

DIANA WHITE
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TO: FBNT LLC
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TOM ORLANDO
CLERK OF COURTS OF COMMON PLEAS
LORAIN COUNTY, OHIO

BY: 
Deputy Clerk

20CV201615